

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**RACHAEL ANNE ELROD, ANDREW KAUFMAN, and SARAH MARTIN,  
on behalf of themselves and all others  
similarly situated,**

**Plaintiffs,**

**v.**

**NO TAX 4 NASH, MICHELLE FOREMAN, and JOHN DOES 1-10,**

**Defendants.**

**No. 3:20-cv-00617**

**District Judge Eli J. Richardson  
Magistrate Judge Barbara D. Holmes**

**CLASS ACTION**

**JURY TRIAL DEMANDED**

**BROOKS BRASFIELD, on behalf of  
himself and others similarly situated,**

**Plaintiff,**

**v.**

**NO TAX 4 NASH and JOHN DOES 1-10**

**Defendants.**

**No. 3:20-cv-00618**

**REVISED PROPOSED CASE MANAGEMENT ORDER**

In compliance with the Court's October 27, 2021 Order (D.E. 117), the parties respectfully submit the following amended proposed case management schedule:

<b>Type of Deadline</b>	<b>Current Deadline</b>	<b>New Deadline (affected in bold)</b>
Proposed Class Notice Plan and/or Preliminary Approval Deadline for Non-Settling Defendants	Suspended	<b>December 17, 2021</b>
Discovery Motions	December 17, 2021	<b>February 11, 2021</b>
Completion of Written Discovery and Fact Witness Depositions	December 31, 2021	<b>February 25, 2021</b>
Plaintiffs and Third-Party Plaintiff Expert Disclosures	January 21, 2022	<b>March 11, 2022</b>
3 <sup>rd</sup> Case Resolution Status Report	January 28, 2022	<b>March 18, 2022</b>
Defendants and Third-Party Defendants' Expert Disclosures	February 28, 2022	<b>April 15, 2022</b>
Expert Depositions	April 29, 2022	<b>May 6, 2022</b>
Dispositive Motions	June 3, 2022	June 3, 2022
Responses to Dispositive Motions	June 24, 2022 (at latest) <sup>1</sup>	June 24, 2022 (at latest)
Replies on Dispositive Motions	July 8, 2022 (at latest)	July 8, 2022 (at latest)
Trial Date	November 8, 2022	November 8, 2022

Per CMO ¶ N, the parties certify that the requested extension still conforms to Local Rule 16.01(h)(1) – indeed, the existing dispositive deadlines are unaffected.

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<sup>1</sup> Responses are due within 21 days of the underlying motion, which therefore could fall before June 24 if the motion is filed earlier. The holds true for Reply briefs, which are due within 14 days of any Response brief.

Dated: November 12, 2021

Respectfully submitted,

/s/ John Spragens

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 12, 2021, a true and correct copy of the foregoing Proposed Case Management Order was served via the Court's online CM/ECF system and emailed notice to the following counsel of record:

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